

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Action No. 05-10917 PBS

)	
The HipSaver Company, Inc.,)	
Plaintiff,)	
)	
v)	
)	
J.T. Posey Company,)	
Defendant.)	
)	
_____)	
)	
J.T. Posey Company, Inc.,)	
Counterclaim Plaintiff,)	
)	
v)	
)	
The HipSaver Company, Inc. and)	
Edward L. Goodwin,)	
Counterclaim Defendants.)	
)	
)	
_____)	

PLAINTIFF'S ASSENTED-TO MOTION FOR LEAVE TO FILE DOCUMENT
UNDER SEAL AS AN EXHIBIT TO ITS REPLY
IN FURTHER SUPPORT OF ITS
MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Pursuant to Local Rule 7.2, Plaintiff, HipSaver moves with assent of the Defendant for leave to file the following document which is subject to a Protective Order under seal:

Deposition of Defendant's controller, Charles Nail, December 15, 2005.

Pursuant to paragraph 4 of the Protective Order, HipSaver requests that this exhibit remain impounded until 30 days after entry of final judgment at which time the exhibit will be retrieved by counsel for HipSaver.

THEREFORE, HipSaver requests allowance of this Motion.

Respectfully submitted,
THE HIPSAVER COMPANY, INC.
By its Attorneys,

/s/ Courtney M. Quish
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Dated: May 3, 2006

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 3, 2006.

/s/ Courtney M. Quish
Courtney M. Quish

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